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June 27, 2023

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**Via ECF**

The Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, NY 10007

The request is granted. The Clerk of Court is respectfully directed to close the motion pending at Docket Number 42, and to sign and issue the subpoenas at Docket Numbers 42-3, 42-4, 42-5 and 42-6.

SO ORDERED.

Date: June 27, 2023  
New York, New York

JOHN P. CRONAN  
United States District Judge

Re: *Wells Fargo Bank, N.A., as Securities Intermediary v. The United States Life Insurance Company in the City of New York, Case No. 1:22-cv-08606-JPC*

Dear Judge Cronan,

This firm represents Plaintiff Wells Fargo Bank, N.A., as Securities Intermediary (“Securities Intermediary”)<sup>1</sup> in this matter. Pursuant to Rule 5.C of Your Honor’s Individual Rules of Practice in Civil Cases, the Securities Intermediary files this unopposed Letter-Motion seeking Court issuance of subpoenas to certain federal and state agencies for records reflecting the date of birth of Catherine Cohen – the insured under the life insurance policy at issue in this action. Prior to filing this Letter-Motion, Counsel for the Securities Intermediary conferred with counsel for Defendant the United States Life Insurance Company in the City of New York (“U.S. Life”), and U.S. Life consents to the relief requested herein.

The Securities Intermediary brought this breach of contract action against U.S. Life based on U.S. Life’s wrongful refusal to pay the \$9.8 million death benefit (the “Death Benefit Amount”) owed under a life insurance policy that U.S. Life issued on the life of Catherine Cohen in 2005 and that the Securities Intermediary became the beneficiary of in 2011 (the “Policy”). (See Exhibit A to Am. Compl.; *see also* Am. Compl. ¶ 33). Despite having collected \$11 million in premiums for the Policy (*id.* ¶¶ 33-35), after Ms. Cohen died and the Securities Intermediary submitted its claim for the death benefit, U.S. Life wrongfully denied coverage, thereby breaching the Policy, and filed a declaratory judgment action in this Court asking for a declaration that U.S. Life had no obligation to pay the Death Benefit Amount (*see* ECF No. 17-1, Dec. Action Compl.).<sup>2</sup>

U.S. Life has denied coverage under the Policy based on an alleged misstatement of age by Ms. Cohen in the application for the Policy. U.S. Life alleges that Ms. Cohen’s date of birth was not May 10, 1921, as stated in the Policy application, but was instead a little over a year earlier on January 29, 1920. (See ECF No. 37, Amended Answer to Amended Complaint). U.S. Life alleges that Ms. Cohen fraudulently misstated her birthdate on the application and, thus, U.S. Life

<sup>1</sup> At all times, Securities Intermediary has acted, and continues to act, solely in a ministerial capacity as a securities intermediary for a third-party customer pursuant to the Uniform Commercial Code. *See* U.C.C. § 8-102(a)(14).

<sup>2</sup> The “Dec. Action Compl.” refers to the (now dismissed) lawsuit filed by U.S. Life against the Securities Intermediary captioned *U.S. Life Ins. Co. in the City of N.Y. v. Wells Fargo Bank, N.A.*, No. 1:22-cv-05621, ECF No. 1.



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is entitled to reform the Policy's "maturity date" or the Death Benefit Amount based on a purported fraudulently induced unilateral mistake. (*Id.* at Affirmative Defenses).

The Securities Intermediary believes that Ms. Cohen's May 10, 1921 birthdate listed in the Policy application was either accurate or, if inaccurate, that any inaccuracy was an innocent mistake. In opposing U.S. Life's motion to amend its Answer to assert its affirmative defense based on fraud, the Securities Intermediary noted that at the time she applied for the Policy from U.S. Life in 2005, both Ms. Cohen's Florida driver's license and Florida voting records reflected the same May 10, 1921 birthdate as listed in the Application. In granting U.S. Life leave to assert a fraud defense, the Court held that:

[These records] appear to show only that Cohen received a driver license with the May 10, 1921 birthdate, and registered to vote using that birthdate, within two years of applying for the policy at issue—around the same time that she was applying for other policies. *See* Dkt. 34-6 at 7-9. While perhaps more longstanding records would more strongly suggest that Cohen did not know her true birthdate and that she sincerely believed it was May 10, 1921 at the time she applied for life insurance, these records created only shortly before the alleged fraud do not overcome the plausible inference that Cohen did know her birthdate when she applied for insurance with Defendant.

(ECF No. 36, Order at 9).

Thus, the issues of what Ms. Cohen's actual birthdate was and, more importantly, what she believed her birthdate to be at the time she applied for the Policy are relevant issues in this case. In accordance with the Court's previous guidance in the Order, the Securities Intermediary has been seeking, through public records requests, "more longstanding" government records reflecting the birthdate used by Ms. Cohen earlier in her life: including historical driving records, voting registration records, social security records, passport records, and marriage certificate records. The records the Securities Intermediary has obtained so far confirm that Ms. Cohen consistently used May 10, 1921 as her birthdate for decades preceding applying for the Policy. Indeed, in Ms. Cohen's (then Mozola) affidavit for license to marry, marriage license, and marriage certificate—*from March 1944*—Ms. Cohen's listed date of birth is May 10, 1921. *See Exhibit A.* As another example, attached as **Exhibit B** is a driving abstract record from the New York DMV reflecting a May 10, 1921 birthdate for Ms. Cohen on her New York drivers licenses.

However, several government agencies have not responded to the Securities Intermediary's public record requests<sup>3</sup> and/or have guidelines indicating they will not comply with subpoenas unless issued by a court (and not third-party subpoenas issued by attorneys of record pursuant to

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<sup>3</sup> The Securities Intermediary requested information from both the Social Security Administration and the Department of State under the Freedom of Information Act. Copies of these requests are attached as **Exhibits G and H.** To date, the Securities Intermediary has not received a response to either request.



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Fed. R. Civ. P. 45(a)(3)). For example, the Social Security's website states: "Generally, SSA will not respond to a subpoena for records unless it is signed by a federal district court judge and meets the other requirements listed in our court order regulation at 20 C.F.R § 401.180."<sup>4</sup> Similarly, the Department of State's website indicates that it may "release passport information after receiving a written request from the presiding judge in a domestic civil suit."<sup>5</sup>

As for the state agencies, the New York Department of Motor Vehicles' website indicates that subpoenas issued by federal judges will be honored.<sup>6</sup> As for the New York State Board of Elections, individuals cannot even submit requests for public records unless they certify that the request is made for "election purposes."<sup>7</sup>

Accordingly, in order to enable the Securities Intermediary to obtain additional, relevant documents reflecting Ms. Cohen's birthdate, as used in official government records during the course of her life, the Securities Intermediary is in need of the Court's assistance to obtain documents from the following agencies: the (1) Social Security Administration; (2) United States Department of State; (3) New York State Board of Elections; and (4) New York Department of Motor Vehicles. By way of example, the Department of State should be in possession of copies of Ms. Cohen's passport applications (if any) and passports (if any), which would both presumably reflect the date of birth she gave when applying for a passport. The Securities Intermediary therefore requests that the Court issue subpoenas to these government agencies. Copies of the proposed subpoenas are attached as **Exhibits C-F**.

Because this litigation will require the trier-of-fact to determine whether Ms. Cohen fraudulently misstated her birthdate in the Policy application, the Securities Intermediary asks the Court to issue subpoenas, attached as **Exhibits C-F**,<sup>8</sup> requiring the applicable federal and state agencies to produce certain documents where Ms. Cohen's date of birth likely appears.

Respectfully submitted,

/s/ John E. Failla  
John E. Failla

cc: Plaintiff's Counsel of Record (via ECF)

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<sup>4</sup> SSA.GOV, Court Orders, Subpoenas, Law Enforcement Requests and Other Legal Processes, [https://www.ssa.gov/privacy\\_courtorders\\_subpoenas\\_lawenforcementrequests\\_legalprocesses.html](https://www.ssa.gov/privacy_courtorders_subpoenas_lawenforcementrequests_legalprocesses.html) (last visited June 18, 2023).

<sup>5</sup> TRAVEL.STATE.GOV, *Passport Information for Judges and Lawyers*, <https://travel.state.gov/content/travel/en/passports/legal-matters/family-law.html> (last visited June 18, 2023).

<sup>6</sup> DMV.NY.GOV, *How to serve a subpoena*, <https://dmv.ny.gov/dmv-records/how-serve-subpoena> (last visited June 18, 2023) ("The DMV will honor a subpoena if it is . . . a subpoena ordered by a federal court.")

<sup>7</sup> ELECTIONS.NY.GOV, *Freedom of Information Requests (FOIL)*, <https://www.elections.ny.gov/FoilRequests.html> (last visited June 18, 2023).

<sup>8</sup> With respect to the subpoena to the New York State Board of Elections, the Securities Intermediary does not seek any information regarding Ms. Cohen's voting history and only seeks information reflecting Ms. Cohen's date of birth. All other information may be redacted.

# Exhibit A

STATE OF NEW YORK

## Affidavit for License to Marry

**INDEXED**

STATE OF NEW YORK  
County of Kings, City of New York  
Borough of Brooklyn

MAR 1 } 3 01 PM '44

Date of Marriage

Church

Location

Clergyman

and

GROOM

BRIDE

Samuel Cohen Catherine Mozola

applicants for a license for marriage, being severally sworn, depose and say, to the best of their knowledge and belief the following statement respectively signed by them is true, and that no legal impediment exists as to the right of each of the applicants to enter into the marriage state.

## FROM THE GROOM:

Full name Samuel Cohen  
Color or race White  
Place of residence 331 Broadway St.  
(Street Address)  
Brooklyn, N.Y.  
Age 23 Date of Birth July - 31 Year 1920

Occupation Soldier  
Place of birth N.Y. Man  
Full name of father James  
Country of birth of father Russia  
Full maiden name of mother Judie

Country of birth of mother Russia  
Number of previous marriages of groom none  
Full names of wives during former marriages {  
1. \_\_\_\_\_  
2. \_\_\_\_\_}

Are they living or dead.  
Is applicant a divorced person.  
If so, when and where and against whom divorce or divorces were granted.  
1. \_\_\_\_\_  
2. \_\_\_\_\_

Where did applicant live last with each wife.

Grounds of the divorces.  
Where was defendant served with summons.Did defendant appear in person in Court.  
Or by attorney or serve answer or file waiver.

I declare that no legal impediment exists as to my right to enter into the marriage state.

Signature of Groom

Subscribed and sworn to before me this

day of 19  
James J. Kennedy  
Clerk.

Date of Marriage

Church

Location

Clergyman

3/1/44

## FROM THE BRIDE:

Full name Catherine Mozola  
Color or race white  
Place of residence 734 South 9th St.  
(Street Address)  
Brooklyn, N.Y.  
Age 22 Date of Birth May 10 Year 1921

Occupation Defense worker  
Place of birth Waukegan, Ill.  
Full name of father Anthony Mozola  
Country of birth of father Russia  
Full maiden name of mother Mary Somone

Country of birth of mother Poland  
Number of previous marriages of bride none  
Full names of husbands during former marriages {  
1. \_\_\_\_\_  
2. \_\_\_\_\_}

Are they living or dead.  
Is applicant a divorced person.  
If so, when and where and against whom divorce or divorces were granted.  
1. \_\_\_\_\_  
2. \_\_\_\_\_

Where did applicant live last with each husband.

Grounds of the divorces.  
Where was defendant served with summons.Did defendant appear in person in Court.  
Or by attorney or serve answer or file waiver.

I declare that no legal impediment exists as to my right to enter into the marriage state.

Signature of Bride

### CERTIFICATE OF CONSENT

This is to certify that....., who have hereto subscribed.....name, do hereby consent that

(Name of Minor)

who is.....and who is under the age of.....years, having been born.....19.....  
(My or our Son, Daughter or Ward)

shall be united in marriage to.....by any minister of the gospel or other person  
authorized by law to solemnize marriages.

Witness my hand this.....day of.....A. D.....19.....

Subscribed and sworn to before me  
on.....  
Clerk

(Signatures of Parents or Guardian)

### CERTIFICATE OF CONSENT

This is to certify that....., who have hereto subscribed.....name, do hereby consent that

(Name of Minor)

who is.....and who is under the age of.....years, having been born.....19.....  
(My or our Son, Daughter or Ward)

shall be united in marriage to.....by any minister of the gospel or other person  
authorized by law to solemnize marriages.

Witness my hand this.....day of.....A. D.....19.....

Subscribed and sworn to before me  
on.....  
Clerk

(Signatures of Parents or Guardian)

## THIS MARRIAGE LICENSE IS VALID FOR SIXTY DAYS

THIS IS A MARRIAGE LICENSE, AND NOT A MARRIAGE CERTIFICATE. The Marriage Certificate on the reverse side should be filled out and filed promptly by the Clergyman or Magistrate as required by law, with the Town or City Clerk who issued the license. See that your marriage is thus recorded.

PLACE OF REGISTRY  
STATE OF NEW YORK  
County of Kings  
City of New York  
Borough of Brooklyn

NEW YORK STATE DEPARTMENT OF HEALTH

Division of Vital Statistics

MARRIAGE LICENSE Registered No.....

3079

Know all Men by this Certificate, that any person authorized by law to perform marriage ceremonies within the State of New York to whom this may come, he, not knowing any lawful impediment thereto, is hereby authorized and empowered to solemnize the rites of matrimony between..... Samuel Cohen

of..... Brooklyn in the county of..... Kings and State of New York  
and..... Catherine Mozola of..... Brooklyn

in the county of..... Kings and State of New York and to certify the same to be said parties or either of them under his hand and seal in his ministerial or official capacity and thereupon he is required to return his certificate in the form hereto annexed. The statements endorsed hereon or annexed hereto by me subscribed, contain a full and true abstract of all of the facts concerning such parties disclosed by their affidavits or verified statements presented to me upon the application for this license.

Such application was accompanied by papers complying with the applicable requirements of section thirteen-a of the Domestic Relations Law, relative to examination and health of the parties, or such compliance was dispensed with, wholly or partly, by order of a judge or justice.

In Testimony Whereof I have hereunto set my hand and affixed the seal of said City at the Municipal Building, Brooklyn.

NOT VALID FOR 24 HOURS

MAR 1 3 01 PM '44

City Clerk.

SEAL

The following is a full and true abstract of all the facts disclosed by the above-named applicants in their verified statements presented to me upon their applications for the above license:

## FROM THE GROOM:

Full name..... Samuel Cohen  
Color ..... W  
Place of residence 331 Rodney St., Bklyn.  
(Street Address)

Age ..... 23 July 31, 1920  
(Date of Birth) (Year)

Occupation Soldier  
Place of birth Manhattan, NY  
Full name of father Louis  
Country of birth of father Russia  
Full maiden name of mother Sadie (unknown)

Country of birth of mother Russia  
Number of previous marriages of groom None

Full names of wives during former marriages { 1.....  
2.....

Are they living or dead.....  
Is applicant a divorced person.....  
If so, when and where and against whom divorce or divorces were granted.....

1.....  
2.....

Where did applicant live last with each wife.....

Grounds of the divorces.....  
Where was defendant served with summons.....

Did defendant appear in person in Court.....  
Or by attorney or serve answer or file waiver.....

I declare that no legal impediment exists as to my right to enter into the marriage state.

## FROM THE BRIDE

Full name..... Catherine Mozola  
Color ..... W  
Place of residence 234 So. 9 St. Bklyn.  
(Street Address)

Age ..... 22 May 10, 1921  
(Date of Birth) (Year)

Occupation Defense Worker  
Place of birth Nanticoke, Pa.  
Full name of father Anthony  
Country of birth of father Russia  
Full maiden name of mother Mary Somone

Country of birth of mother Poland  
Number of previous marriages of bride None

Full names of husbands during former marriages { 1.....  
2.....

Are they living or dead.....  
Is applicant a divorced person.....  
If so, when and where and against whom divorce or divorces were granted.....

1.....  
2.....

Where did applicant live last with each husband.....

Grounds of the divorces.....  
Where was defendant served with summons.....

Did defendant appear in person in Court.....  
Or by attorney or serve answer or file waiver.....

I declare that no legal impediment exists as to my right to enter into the marriage state.

TO BE MARRIED IN THE CITY CLERK'S OFFICE,  
YOU MUST BRING DOCUMENTARY PROOF OF  
AGE AT THE TIME OF THE CEREMONY.

2737

The written consent of the Parents, Guardians or Person under whose care and government the Minor or Minors may be has been filed in the City Clerk's Office in the Borough of Brooklyn as provided by Section 15, of Article 3 of the Domestic Relations Law.

### MARRIAGE CERTIFICATE TO CLERGYMEN AND MAGISTRATES

The license issued, including the abstract of facts, and certificate duly signed by the person who shall have solemnized the marriage therein authorized shall be returned by him to the office of the town or city clerk who issued the same within five days succeeding the date of the solemnizing of the marriage therein authorized and any person or persons who shall wilfully neglect to make such return within the time above required shall be deemed guilty of a misdemeanor and upon conviction thereof shall be punished by a fine of not less than twenty-five dollars or more than fifty dollars for each and every offense. (DOMESTIC RELATIONS LAW, SECTION 14)

Where either or both of the parties is under the age of twenty-one years, the marriage shall be solemnized only by a clergyman, mayor of a city, justice or judge of a court of record, justice of the court of Special Sessions of the City of New York, justice of the Domestic Relations Court of the City of New York or by a judge of a Children's Court. (Subdivision 5, of Section 11 of the Domestic Relations Law)

Frank A. Nolan  
Deputy City Clerk

I, \_\_\_\_\_  
(Print name) \_\_\_\_\_ a \_\_\_\_\_  
(Title of person performing ceremony)

257 EAST 29 ST.

residing at.....

*Brooklyn* in the county of *Kings* and State of New York, do hereby certify that I did on this

day of..... in the year A. D. 19....., at..... M. at.....

1944 MAR 1 PM 3 31

in the county of..... and State of New York, solemnize the rites of matrimony between.....

*Samuel Cohen*  
*Brooklyn* in the county of *Kings* and State of New York, and

*Goldene Mozola*  
*Brooklyn* in the county of *Kings* and State of New York in the

presence of *Julia Mozola* *J. T. Sheddock* and.....

as witness and the license therefor is hereto annexed.

MUNICIPAL BUILDING

Witness my hand at..... in the county of.....

this..... day of..... A. D. 19.....

In presence of

*Julia Mozola*  
(Signature of Witness)

*Frank A. Nolan*  
(Signature of Person Performing Ceremony)

Residence

*234 89th St.*  
*J. T. Sheddock*  
(Signature of Witness)

*257 East 29st*  
(Address of Person Performing Ceremony)

Residence

*95 N. 7th St. B'klyn.*

# Exhibit B

Document # LDMR0005

PRINT DATE: 2/27/2023 TIME: 07:52:13 OPERATOR: DMR OFFICE: DAB

COHEN, CATHERINE, T  
59-42 163RD STREET  
FLUSHING NY 11365

CLIENT ID#: 252589077  
DOB: 05/10/1921 SEX: F  
HEIGHT: 5-0 EYE COLOR: BLUE  
COUNTY: QUEE  
MI #: C15292 89563 963361-21

RESTRICTIONS: CORRECTIVE LENSES

LICENSE CLASS: \*D\*

STATUS:SURRENDERED EXPIRATION: 05/10/2003

\*\*\*\*\*

CLASS CHANGE: 05/06/1994

ACTIVITY

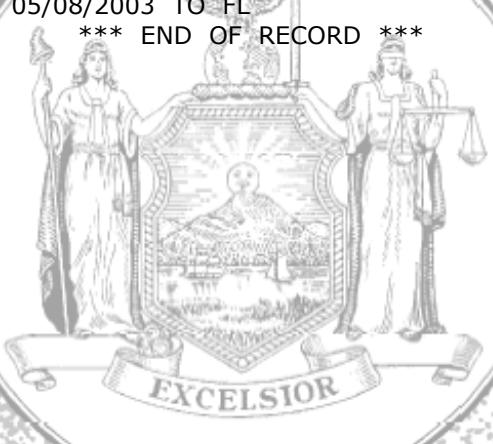
\*\*\*\*\*

NEW: \*D\*

OLD: \*5\*

DOCUMENT SURRENDERED ON: 05/08/2003 TO FL

\*\*\* END OF RECORD \*\*\*



This is to certify that this document is a true and complete copy of an electronic record on file in the New York State Department of Motor Vehicles, Albany, New York. The record was made in regular course of New York State Department of Motor Vehicles daily business. It is the business of the New York State Department of Motor Vehicles to create and maintain the records of drivers in the state of New York. Entries in this document are made at the time the recorded transactions or events took place or within a reasonable time thereafter. The person who reports the information is under a business duty to do so accurately.

# Exhibit C

**UNITED STATES DISTRICT COURT**  
for the  
**Southern District of New York**

WELLS FARGO BANK, N.A., as Secs. Intermediary

*Plaintiff*

v.

THE UNITED STATES LIFE INSURANCE  
COMPANY IN THE CITY OF NEW YORK

*Defendant*

)  
)  
)  
)  
)

Civil Action No. 1:22-CV-08606

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: The General Counsel, Social Security Administration, Room 617 Altmeyer Building, 6401 Security Blvd. Baltimore,  
MD 21235-6401

*(Name of person to whom this subpoena is directed)*

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See attached.

Place: Proskauer Rose LLP, Eleven Times Square, New York, NY 10036	Date and Time: 07/07/2023 9:00 a.m.
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**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

*CLERK OF COURT*

OR

*Signature of Clerk or Deputy Clerk*

*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Wells Fargo Bank, N.A., as Securities Intermediary, who issues or requests this subpoena, are:

John Failla, Eleven Times Square, New York, NY 10036, jfailla@proskauer.com, 212-969-3141

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:22-CV-08606

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for (*name of individual and title, if any*) \_\_\_\_\_

on (*date*) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

on (*date*) \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:  
\_\_\_\_\_  
\_\_\_\_\_

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

**(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT A**

For a statement of your obligation in producing documents under this subpoena, see Rule 45(e)(1) and (2) of the Federal Rules of Civil Procedure, which appears on the final page of the subpoena.

**DEFINITIONS AND INSTRUCTIONS**

1. These definitions expressly incorporate by reference and utilize the uniform definitions and rules of construction set forth in Rule 26.3 of the Local Rules of the United States District Court for the Southern District of New York, as well as the definitions and rules of construction set forth in the Federal Rules of Civil Procedure.
2. The terms "SSA," "You," and "your" refer to the Social Security Administration.
3. "Document," in addition to the definition provided in Local Rule 26.3, shall have the broadest meaning ascribed to it by FRCP 34 and Federal Rule of Evidence 1001, including, without limitation, all writings and records, including, but not limited to, originals and all copies, unless identical, regardless of origin or location, of written, recorded and graphic matter, however produced or reproduced, formal or informal, including, without limitation, any form of communication, correspondence, memoranda, letters, facsimiles, electronic mail ("e-mail"), text messages, instant messages, WhatsApp messages, Slack messages, blog posts or comments, all social media content (including, but not limited to, posts, comments, or messages on or sent through Facebook, Twitter, LinkedIn, Pinterest, Instagram or any other social networking or social media site), website postings or entries and content stored in cloud based accounts, drop-box accounts and other applications including on mobile and wearable computing devices, drafts, reports, statements, notes (including stenographic notes), records, letters, envelopes, telegrams, telephone logs, messages (including reports, notes, and memoranda of personal or other telephone

conversations and conferences), contracts, agreements, summaries, photographs, phonograph, tape or other recordings, disks, data cells, drums, printouts and other compilations from which information can be obtained (translated, if necessary, through detection devices into usable form), and any other writings or documents of whatever description or kind, including attachments or other matters affixed thereto and copies of any of the foregoing in the possession, custody or control of the SSA or any other person acting on the SSA's behalf, including, without limitation, any material described above that originally may have been generated by another person or entity and is now in the SSA's possession, custody, or control. "Document" shall also include all drafts of documents defined above.

4. "Ms. Cohen" refers to Catherine T. Cohen, Catherine Mozola, Catherine Mozala, Catherine Mazola, or any other individual associated with the Social Security number [REDACTED] 6451.

5. Electronically stored information shall be produced in an unaltered native production database file format or near-native format, such as, csv, Microsoft Excel, or xml, and shall be searchable, sortable, and free from password or any form of encryption that would obstruct an ability to view any data field.

#### **DOCUMENTS REQUESTED FOR PRODUCTION**

1. All Documents Ms. Cohen provided you when applying for a social security number.
2. Copies of all applications Ms. Cohen submitted for social security benefits.
3. All Documents in your possession, custody, or control reflecting Ms. Cohen's date of birth.

# Exhibit D

**UNITED STATES DISTRICT COURT**  
for the  
**Southern District of New York**

WELLS FARGO BANK, N.A., as Secs. Intermediary

*Plaintiff*

v.

THE UNITED STATES LIFE INSURANCE  
COMPANY IN THE CITY OF NEW YORK

*Defendant*

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Civil Action No. 1:22-CV-08606

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Office of Information Programs and Services A/GIS/IPS/RL 2201 C. Street N.W., Suite B266 Washington, D.C.  
20520-0000

*(Name of person to whom this subpoena is directed)*

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See attached.

Place: Proskauer Rose LLP, Eleven Times Square, New York, NY 10036	Date and Time: 07/07/2023 9:00 a.m.
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**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

*CLERK OF COURT*

OR

*Signature of Clerk or Deputy Clerk*

*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Wells Fargo Bank, N.A., as Securities Intermediary, who issues or requests this subpoena, are:

John Failla, Eleven Times Square, New York, NY 10036, jfailla@proskauer.com, 212-969-3141

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:22-CV-08606

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for (*name of individual and title, if any*) \_\_\_\_\_

on (*date*) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

on (*date*) \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:  
\_\_\_\_\_  
\_\_\_\_\_

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

- (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

#### (2) Command to Produce Materials or Permit Inspection.

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

#### (3) Quashing or Modifying a Subpoena.

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### (g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT A**

For a statement of your obligation in producing documents under this subpoena, see Rule 45(e)(1) and (2) of the Federal Rules of Civil Procedure, which appears on the final page of the subpoena.

**DEFINITIONS AND INSTRUCTIONS**

1. These definitions expressly incorporate by reference and utilize the uniform definitions and rules of construction set forth in Rule 26.3 of the Local Rules of the United States District Court for the Southern District of New York, as well as the definitions and rules of construction set forth in the Federal Rules of Civil Procedure.

2. The terms “Department of State,” “you,” and “your” refer to the U.S. Department of State.

3. “Document,” in addition to the definition provided in Local Rule 26.3, shall have the broadest meaning ascribed to it by FRCP 34 and Federal Rule of Evidence 1001, including, without limitation, all writings and records, including, but not limited to, originals and all copies, unless identical, regardless of origin or location, of written, recorded and graphic matter, however produced or reproduced, formal or informal, including, without limitation, any form of communication, correspondence, memoranda, letters, facsimiles, electronic mail (“e-mail”), text messages, instant messages, WhatsApp messages, Slack messages, blog posts or comments, all social media content (including, but not limited to, posts, comments, or messages on or sent through Facebook, Twitter, LinkedIn, Pinterest, Instagram or any other social networking or social media site), website postings or entries and content stored in cloud based accounts, drop-box accounts and other applications including on mobile and wearable computing devices, drafts, reports, statements, notes (including stenographic notes), records, letters, envelopes, telegrams,

telephone logs, messages (including reports, notes, and memoranda of personal or other telephone conversations and conferences), contracts, agreements, summaries, photographs, phonograph, tape or other recordings, disks, data cells, drums, printouts and other compilations from which information can be obtained (translated, if necessary, through detection devices into usable form), and any other writings or documents of whatever description or kind, including attachments or other matters affixed thereto and copies of any of the foregoing in the possession, custody or control of the Department of State or any other person acting on the Department of State's behalf, including, without limitation, any material described above that originally may have been generated by another person or entity and is now in the Department of State's possession, custody, or control. "Document" shall also include all drafts of documents defined above.

4. "Ms. Cohen" refers to Catherine T. Cohen, Catherine Mozola, Catherine Mozala, Catherine Mazola, or any other individual associated with the Social Security number [REDACTED] 6451.

5. Electronically stored information shall be produced in an unaltered native production database file format or near-native format, such as, csv, Microsoft Excel, or xml, and shall be searchable, sortable, and free from password or any form of encryption that would obstruct an ability to view any data field.

#### **DOCUMENTS REQUESTED FOR PRODUCTION**

1. All Documents Ms. Cohen submitted when applying for a United States issued passport.
2. Copies of all passports you issued to Ms. Cohen.
3. All Documents in your possession, custody, or control reflecting Ms. Cohen's date of birth.

# Exhibit E

**UNITED STATES DISTRICT COURT**  
for the  
**Southern District of New York**

WELLS FARGO BANK, N.A., as Secs. Intermediary

*Plaintiff*

v.

THE UNITED STATES LIFE INSURANCE  
COMPANY IN THE CITY OF NEW YORK

*Defendant*

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Civil Action No. 1:22-CV-08606

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: New York State Board of Elections 40 North Pearl Street, Suite 5 Albany, NY 12207-2729

*(Name of person to whom this subpoena is directed)*

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See attached.

Place: Proskauer Rose LLP, Eleven Times Square, New York, NY 10036	Date and Time: 07/07/2023 9:00 a.m.
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**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

*CLERK OF COURT*

OR

*Signature of Clerk or Deputy Clerk*

*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Wells Fargo Bank, N.A., as Securities Intermediary, who issues or requests this subpoena, are:

John Failla, Eleven Times Square, New York, NY 10036, jfailla@proskauer.com, 212-969-3141

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:22-CV-08606

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for (*name of individual and title, if any*) \_\_\_\_\_

on (*date*) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

on (*date*) \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:  
\_\_\_\_\_  
\_\_\_\_\_

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

- (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

#### **(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

#### **(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### **(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### **(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT A**

For a statement of your obligation in producing documents under this subpoena, see Rule 45(e)(1) and (2) of the Federal Rules of Civil Procedure, which appears on the final page of the subpoena.

**DEFINITIONS AND INSTRUCTIONS**

1. These definitions expressly incorporate by reference and utilize the uniform definitions and rules of construction set forth in Rule 26.3 of the Local Rules of the United States District Court for the Southern District of New York, as well as the definitions and rules of construction set forth in the Federal Rules of Civil Procedure.

2. The terms “Board of Elections,” “you,” and “your” refer to the New York State Board of Elections.

3. “Document,” in addition to the definition provided in Local Rule 26.3, shall have the broadest meaning ascribed to it by FRCP 34 and Federal Rule of Evidence 1001, including, without limitation, all writings and records, including, but not limited to, originals and all copies, unless identical, regardless of origin or location, of written, recorded and graphic matter, however produced or reproduced, formal or informal, including, without limitation, any form of communication, correspondence, memoranda, letters, facsimiles, electronic mail (“e-mail”), text messages, instant messages, WhatsApp messages, Slack messages, blog posts or comments, all social media content (including, but not limited to, posts, comments, or messages on or sent through Facebook, Twitter, LinkedIn, Pinterest, Instagram or any other social networking or social media site), website postings or entries and content stored in cloud based accounts, drop-box accounts and other applications including on mobile and wearable computing devices, drafts, reports, statements, notes (including stenographic notes), records, letters, envelopes, telegrams,

telephone logs, messages (including reports, notes, and memoranda of personal or other telephone conversations and conferences), contracts, agreements, summaries, photographs, phonograph, tape or other recordings, disks, data cells, drums, printouts and other compilations from which information can be obtained (translated, if necessary, through detection devices into usable form), and any other writings or documents of whatever description or kind, including attachments or other matters affixed thereto and copies of any of the foregoing in the possession, custody or control of the Board of Elections or any other person acting on the Board of Elections' behalf, including, without limitation, any material described above that originally may have been generated by another person or entity and is now in the Board of Elections' possession, custody, or control. "Document" shall also include all drafts of documents defined above.

4. "Ms. Cohen" refers to Catherine T. Cohen, Catherine Mozola, Catherine Mozala, Catherine Mazola, or any other individual associated with the Social Security number [REDACTED] 6451.

5. Electronically stored information shall be produced in an unaltered native production database file format or near-native format, such as, csv, Microsoft Excel, or xml, and shall be searchable, sortable, and free from password or any form of encryption that would obstruct an ability to view any data field.

6. In making the specific requests below, it is anticipated that information reflecting Ms. Cohen's party affiliation (if any) and election selections will be redacted. These document requests are targeted at ascertaining information concerning Ms. Cohen's date of birth only.

#### **DOCUMENTS REQUESTED FOR PRODUCTION**

1. All Documents Ms. Cohen provided to you when registering to vote.
2. Copies of all of Ms. Cohen's voting records, but only to the extent such records include Ms. Cohen's date of birth.

3. All voter registration cards issued by you to Ms. Cohen.
4. All Documents in your possession, custody, or control reflecting Ms. Cohen's date of birth.

# Exhibit F

**UNITED STATES DISTRICT COURT**  
for the  
**Southern District of New York**

WELLS FARGO BANK, N.A., as Secs. Intermediary

*Plaintiff*

v.

THE UNITED STATES LIFE INSURANCE  
COMPANY IN THE CITY OF NEW YORK

*Defendant*

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Civil Action No. 1:22-CV-08606

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: NYS DMV, Subpoena Office, 6 Empire State Plaza, Room 330A Albany, NY 12228

*(Name of person to whom this subpoena is directed)*

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See attached.

Place: Proskauer Rose LLP, Eleven Times Square, New York, NY 10036	Date and Time: 07/07/2023 9:00 a.m.
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**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

*CLERK OF COURT*

OR

*Signature of Clerk or Deputy Clerk*

*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Wells Fargo Bank, N.A., as Securities Intermediary, who issues or requests this subpoena, are:

John Failla, Eleven Times Square, New York, NY 10036, jfailla@proskauer.com, 212-969-3141

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:22-CV-08606

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for (*name of individual and title, if any*) \_\_\_\_\_

on (*date*) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

on (*date*) \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:  
\_\_\_\_\_  
\_\_\_\_\_

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

- (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

#### **(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

#### **(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### **(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### **(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT A**

For a statement of your obligation in producing documents under this subpoena, see Rule 45(e)(1) and (2) of the Federal Rules of Civil Procedure, which appears on the final page of the subpoena.

**DEFINITIONS AND INSTRUCTIONS**

1. These definitions expressly incorporate by reference and utilize the uniform definitions and rules of construction set forth in Rule 26.3 of the Local Rules of the United States District Court for the Southern District of New York, as well as the definitions and rules of construction set forth in the Federal Rules of Civil Procedure.

2. The terms “DMV,” “you,” and “your” refer to the New York State Department of Motor Vehicles.

3. “Document,” in addition to the definition provided in Local Rule 26.3, shall have the broadest meaning ascribed to it by FRCP 34 and Federal Rule of Evidence 1001, including, without limitation, all writings and records, including, but not limited to, originals and all copies, unless identical, regardless of origin or location, of written, recorded and graphic matter, however produced or reproduced, formal or informal, including, without limitation, any form of communication, correspondence, memoranda, letters, facsimiles, electronic mail (“e-mail”), text messages, instant messages, WhatsApp messages, Slack messages, blog posts or comments, all social media content (including, but not limited to, posts, comments, or messages on or sent through Facebook, Twitter, LinkedIn, Pinterest, Instagram or any other social networking or social media site), website postings or entries and content stored in cloud based accounts, drop-box accounts and other applications including on mobile and wearable computing devices, drafts, reports, statements, notes (including stenographic notes), records, letters, envelopes, telegrams,

telephone logs, messages (including reports, notes, and memoranda of personal or other telephone conversations and conferences), contracts, agreements, summaries, photographs, phonograph, tape or other recordings, disks, data cells, drums, printouts and other compilations from which information can be obtained (translated, if necessary, through detection devices into usable form), and any other writings or documents of whatever description or kind, including attachments or other matters affixed thereto and copies of any of the foregoing in the possession, custody or control of the DMV or any other person acting on the DMV's behalf, including, without limitation, any material described above that originally may have been generated by another person or entity and is now in the DMV's possession, custody, or control. "Document" shall also include all drafts of documents defined above.

4. "Ms. Cohen" refers to Catherine T. Cohen, Catherine Mozola, Catherine Mozala, Catherine Mazola, or any other individual associated with the Social Security number [REDACTED] 6451.

5. Electronically stored information shall be produced in an unaltered native production database file format or near-native format, such as, csv, Microsoft Excel, or xml, and shall be searchable, sortable, and free from password or any form of encryption that would obstruct an ability to view any data field.

#### **DOCUMENTS REQUESTED FOR PRODUCTION**

1. All Documents Ms. Cohen provided to you when applying for a driver's license or license renewal.
2. Copies of all driver's licenses you issued to Ms. Cohen.
3. All Documents in your possession, custody, or control reflecting Ms. Cohen's date of birth.

# Exhibit G

# SSA-2023-004977 Request Details

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Submitted



Evaluation



Assignment



Processing



Closed

## Contact Information

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<b>Full Name</b>	Angelo Monforte
<b>Organization</b>	Proskauer Rose LLP
<b>Email Address</b>	amonforte@proskauer.com
<b>Phone Number</b>	5619954767
<b>Fax Number</b>	
<b>Mailing Address Location</b>	United States/US Territories
<b>Address Line 1</b>	2255 Glades Road
<b>Address Line 2</b>	Suite 421 Atrium
<b>City</b>	Boca Raton
<b>State/Province</b>	FL
<b>Zip Code/Postal Code</b>	33431

## Request Information

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<b>Agency</b>	Office of Privacy and Disclosure
<b>Will Pay Up To</b>	\$100.00
<b>Date Submitted</b>	02/22/2023
<b>Estimated Date of Completion</b>	03/24/2023
<b>Fee Category</b>	Other
<b>Request Track</b>	Simple
<b>Request Phase</b>	Closed
<b>Final Disposition</b>	Fee-Related Reason

## Additional Information

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<b>Request Type and Fee</b>	FOIA
<b>Certification</b>	Yes (adds \$10.00 to fee)
<b>Are You Providing the Subject's SSN?</b>	N/A
<b>Date of Birth</b>	N/A
<b>Name of Individual at Birth</b>	N/A
<b>Gender</b>	Female

**Deceased Individual's** N/A**Parent/Mother's Name at Birth****Deceased Individual's** N/A**Parent/Mother's Married Name(s)  
(if any)****Name(s) of Individual(if other than  
above/other names(s) used)** N/A**Deceased Individual's** N/A**Parent/Father's Name at Birth**

## Description

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**Description** The deceased individual's SSN is attached. The desired records are as follows: (i) Photocopy of Original Application for a Social Security Card (SS-5) for a Deceased Individual and (ii) Computer Extract of Social Security Application (Numident) for a Deceased Individual.

## Request Expedited Processing

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**Made Request?** No

## Request a Fee Waiver

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**Made Request?** No

## Supporting Files

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Download	Attached File Name	Size (MB)	File Type
<input type="checkbox"/>	Catherine T. Cohen.pdf	0.0421	Adobe PDF Document

# Exhibit H



Proskauer Rose LLP 2255 Glades Road, Suite 421 Atrium Boca Raton, FL 33431-7360

February 27, 2023

Jared DuBosar  
Attorney at Law  
d +1.561.995.4702  
f 561.241.7145  
jdubosar@proskauer.com  
www.proskauer.com

**Via Electronic Mail**

U.S. Department of State  
Passport Services  
Office of Law Enforcement Liaison  
44132 Mercure Cir.  
P.O. Box 1227  
Sterling, VA 20166  
[PPT-Public-FOIAResquests@state.gov](mailto:PPT-Public-FOIAResquests@state.gov)

Re: FOIA Request – U.S. Passport Records

Dear FOIA Officer:

This is a request under the Freedom of Information Act.

We are requesting the U.S. passport application of Catherine T. Cohen (“Ms. Cohen”) and a copy of Ms. Cohen’s passport. Ms. Cohen’s date of death was October 21, 2021. A copy of Ms. Cohen’s death certificate is attached. To the extent useful, we have also attached a copy of Ms. Cohen’s driver’s license.

My firm is willing to pay all applicable fees for the processing of this request. Should you need any additional information, please contact me.

Thank you,

*Jared DuBosar*

Jared DuBosar

Enclosures

THIS DOCUMENT HAS A LIGHT BACKGROUND ON TRUE WATERMARKED PAPER. HOLD TO LIGHT TO VERIFY FLORIDA WATERMARK.

## BUREAU OF VITAL STATISTICS

## CERTIFICATION OF DEATH

STATE FILE NUMBER: 2021218361

DATE ISSUED: NOVEMBER 4, 2021

## DECEDENT INFORMATION

NAME: CATHERINE T COHEN

DATE OF DEATH: OCTOBER 21, 2021

SEX: FEMALE SSN: [REDACTED] 6451

AGE: 101 YEARS

DATE OF BIRTH: [REDACTED] 1920

BIRTHPLACE: NANTICOKE, PENNSYLVANIA, UNITED STATES

PLACE OF DEATH: DECEDENT'S HOME

FACILITY NAME OR STREET ADDRESS: [REDACTED]

LOCATION OF DEATH: PALM BEACH GARDENS, PALM BEACH COUNTY, 33418

RESIDENCE: [REDACTED] PALM BEACH GARDENS, FLORIDA 33418, UNITED STATES

COUNTY: PALM BEACH

OCCUPATION, INDUSTRY: HOMEMAKER, OWN HOME

EDUCATION: 8TH GRADE OR LESS

EVER IN U.S. ARMED FORCES? NO

HISPANIC OR HAITIAN ORIGIN? NO, NOT OF HISPANIC/HAITIAN ORIGIN

RACE: WHITE

## SURVIVING SPOUSE / PARENT NAME INFORMATION

(NAME PRIOR TO FIRST MARRIAGE, IF APPLICABLE)

MARITAL STATUS: WIDOWED

SURVIVING SPOUSE NAME: NONE

FATHER'S/PARENT'S NAME: UNOBTAINABLE

MOTHER'S/PARENT'S NAME: UNOBTAINABLE

## INFORMANT, FUNERAL FACILITY AND PLACE OF DISPOSITION INFORMATION

INFORMANT'S NAME: CAROL COHEN

RELATIONSHIP TO DECEDENT: DAUGHTER

INFORMANT'S ADDRESS: [REDACTED] JUPITER, FLORIDA 33458, UNITED STATES

FUNERAL DIRECTOR/LICENSE NUMBER: TABITHA DENEAULT, F181182

FUNERAL FACILITY: AYCOCK-RIVERSIDE FUNERAL AND CREMATION CENTER F040985

1112 MILITARY TRAIL, JUPITER, FLORIDA 33458

METHOD OF DISPOSITION: CREMATION

PLACE OF DISPOSITION: WEST PALM CREMATORY  
WEST PALM BEACH, FLORIDA

## CERTIFIER INFORMATION

TYPE OF CERTIFIER: CERTIFYING PHYSICIAN

MEDICAL EXAMINER CASE NUMBER: NOT APPLICABLE

TIME OF DEATH (24 HOUR): 1735

DATE CERTIFIED: OCTOBER 27, 2021

CERTIFIER'S NAME: RICHARD STEPHEN LEVENE

CERTIFIER'S LICENSE NUMBER: OS5792

NAME OF ATTENDING PRACTITIONER (IF OTHER THAN CERTIFIER): NOT APPLICABLE

## CAUSE OF DEATH AND INJURY INFORMATION

MANNER OF DEATH: NATURAL

CAUSE OF DEATH - PART I - AND APPROXIMATE INTERVAL: ONSET TO DEATH

a. SENILE DEGENERATION OF BRAIN

b.

c.

d.

PART II - OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN PART I:

AUTOPSY PERFORMED? NO

AUTOPSY FINDINGS AVAILABLE TO COMPLETE CAUSE OF DEATH?

DATE OF SURGERY:

DID TOBACCO USE CONTRIBUTE TO DEATH? NO

REASON FOR SURGERY:

PREGNANCY INFORMATION: NOT PREGNANT WITHIN PAST YEAR

DATE OF INJURY: NOT APPLICABLE

TIME OF INJURY (24 HOUR):

INJURY AT WORK?

LOCATION OF INJURY:

DESCRIBE HOW INJURY OCCURRED:

PLACE OF INJURY:

IF TRANSPORTATION INJURY, STATUS OF DECEDENT:

TYPE OF VEHICLE:

STATE REGISTRAR

REQ: 202330828

THE ABOVE SIGNATURE CERTIFIES THAT THIS IS A TRUE AND CORRECT COPY OF THE OFFICIAL RECORD ON FILE IN THIS OFFICE.  
 THIS DOCUMENT IS PRINTED OR PHOTOCOPIED ON SECURITY PAPER WITH WATERMARKS OF THE GREAT SEAL OF THE STATE OF FLORIDA. DO NOT ACCEPT WITHOUT VERIFYING THE PRESENCE OF THE WATERMARKS. THE DOCUMENT FACE CONTAINS A MULTICOLORED BACKGROUND, GOLD ENBOSSING SEAL, AND THERMODYNAMIC FL. THE BACK CONTAINS SPECIAL LINES WITH TEXT. THIS DOCUMENT WILL NOT PRODUCE A COLOR COPY.



\* 5 8 9 8 5 6 6 8 \*

DH FORM 1947 (03-13)

CERTIFICATION OF VITAL RECORD



VOID IF ALTERED OR ERASED

